IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,

    Plaintiff,

    v.

$250,000.00 IN UNITED STATES
CURRENCY

    Defendant I*n Rem.*

Civil No.:

MOTION TO STAY UNDER 18 U.S.C. § 981(g)

TO THE HONORABLE COURT:

COMES NOW, the United States of America, in support of its Motion to Stay, respectfully states as follows:

1. The United States has filed against the Defendant *In Rem* a Verified Complaint for Forfeiture *In Rem* seeking forfeiture under 18 U.S.C. § 981(a)(1)(A) and 21 U.S.C. § 881(a)(6).

2. Civil discovery in this matter will adversely affect the prosecution of a related criminal investigation.

3. 18 U.S.C. § 981(g)(1) states: "Upon the motion of the United States, the court shall stay the civil forfeiture proceedings if the court determines that civil discovery will adversely affect the ability of the Government to conduct a related criminal investigation or the prosecution of a related criminal case."

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4. In addition, Section 981(g)(5) provides in the pertinent part, that the United States may, in support of its motion for a stay, "submit evidence *ex parte* in order to avoid disclosing any matter that may adversely affect an ongoing criminal investigation."

5. The United States requests a stay to allow the criminal investigation to proceed free of the adverse effect of discovery, evidentiary hearings, or other proceedings in this action.

6. Accordingly, the United States respectfully requests that the Court stay this action pending the conclusion of the criminal investigation, or until further order of the Court.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 6th day of February 2024.

W. STEPHEN MULDROW
United States Attorney

s/Madeline M. Mas Saavedra
Madeline M. Mas Saavedra-227411,
Assistant U.S. Attorney
Torre Chardón, Suite 1201
350 Carlos Chardón Avenue
San Juan, Puerto Rico 00918
Office: 787-772-3904
Mobile: 787-340-1890
madeline.mas.saavedra@usdoj.gov